

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

2015 JAN 21 PM 4:30

CLERK *Giller*

UNITED STATES OF AMERICA

v.

CRIMINAL NO.

JENNIFER RENEE WHITE (1)
BROOKLYN MICHELLE FOWLER (2)

3-15CR-014-P

INDICTMENT

The Grand Jury charges:

Count One

Conspiracy to Commit Bank Fraud
(Violation of 18 U.S.C. § 1349) (18 U.S.C. § 1344))

Introduction

At all times material to the indictment:

1. First Convenience Bank was a division of First National Bank Texas, a financial institution which held accounts insured by the Federal Deposit Insurance Corporation.

The Conspiracy and its Objects

Beginning in or about January 2014, the exact date being unknown to the grand jury, and continuing through on or about July 2014, in the Dallas Division of the Northern District of Texas, and elsewhere, **Jennifer Renee White** and **Brooklyn Michelle Fowler**, defendants, did knowingly and with the intent to defraud conspire,

confederate, and agree to execute a scheme to obtain money from First Convenience Bank by means of false or fraudulent pretenses, in violation of 18 U.S.C. § 1344.

Manner and Means of the Conspiracy

It was part of the conspiracy that the defendants:

- a) opened First Convenience Bank accounts in their own names, but using a Social Security number assigned to a different individual in order to conceal other fraudulently opened accounts;
- b) deposited checks that were drawn on nonexistent bank accounts into those newly opened accounts; and
- c) wrote checks to third party vendors out of those accounts, knowing there were no true funds in the account.

Overt Acts

In furtherance of the conspiracy, the defendants committed the following overt acts, among others, in the Dallas Division of the Northern District of Texas, and elsewhere:

1. On or before April 1, 2014, **White** and **Fowler** obtained or created fraudulent checks, allegedly drawn on Bank of America account number XXXXX2024, which was not a true bank account;
2. On or about April 7, 2014, **White** opened First Convenience Bank account number XXXXX8156 using another individual's Social Security number and deposited

check number 1136, allegedly drawn on Bank of America account number XXXXX2024 into that account;

3. On or between April 7, 2014 and April 11, 2014, **White** wrote checks on account number XXXXX8156, knowing that the check she had deposited was not drawn on a true bank account, resulting in a loss to First Convenience Bank;

4. On or about April 11, 2014, **Fowler** opened First Convenience Bank account number XXXXX4425 using another individual's Social Security number and deposited check number 1133, allegedly drawn on Bank of America account number XXXXX2024 into that account;

5. On or between April 11, 2014 and April 15, 2014, **Fowler** wrote checks on account number XXXXX4425, knowing that the check she had deposited was not drawn on a true bank account, resulting in a loss to First Convenience Bank;

6. On or about April 18, 2014, **Fowler** opened First Convenience Bank account number XXXXX0641 using another individual's Social Security number and deposited check number 1137, allegedly drawn on Bank of America account number XXXXX2024 into that account;

7. On or between April 18, 2014 and April 23, 2014, **Fowler** wrote checks on account number XXXXX0641, knowing that the check she had deposited was not drawn on a true bank account, resulting in a loss to First Convenience Bank;

8. On or about April 25, 2014, **White** opened First Convenience Bank account number XXXXX6324 using another individual's Social Security number and deposited check number 1148, allegedly drawn on Bank of America account number XXXXX2024 into that account; and

9. On or between April 25, 2014 and April 26, 2014, **White** wrote checks on account number XXXXX6324, knowing that the check she had deposited was not drawn on a true bank account, resulting in a loss to First Convenience Bank.

All in violation of 18 U.S.C. § 1349 (18 U.S.C. § 1344).

Count Two

Misrepresentation of a Social Security Number
(Violation of 42 U.S.C. § 408(a)(7)(B))

On or about April 25, 2014, in the Dallas Division of the Northern District of Texas, **Jennifer Renee White**, the defendant, did knowingly and with intent to deceive, falsely represent a number to be the Social Security number assigned by the Commissioner of Social Security to her, when, in fact, such number was not so assigned to **White**, for the purpose of opening a First Convenience Bank account bearing account number XXXXX6324.

In violation of 42 U.S.C. § 408(a)(7)(B).

Count Three

Misrepresentation of a Social Security Number
(Violation of 42 U.S.C. § 408(a)(7)(B))

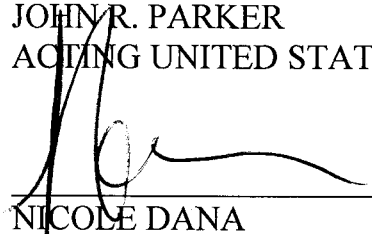
On or about April 11, 2014, in the Eastern District of Texas, **Brooklyn Michelle Fowler**, the defendant, did knowingly and with intent to deceive, falsely represent a number to be the social security number assigned by the Commissioner of Social Security to her, when, in fact, such number was not so assigned to **Fowler**, for the purpose of opening a First Convenience Bank account bearing account number XXXXX4425.

In violation of 42 U.S.C. § 408(a)(7)(B).

A TRUE BILL


FOREPERSON

JOHN R. PARKER
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INDICTMENT

18 U.S.C. § 1349 (18 U.S.C. § 1344)
Conspiracy to Commit Bank Fraud

42 U.S.C. § 408(a)(7)(B)
Misrepresentation of a Social Security Number

3 Counts

A true bill rendered

DALLAS

Anne Bland FOREPERSON

Filed in open court this 21st day of January, 2015

Clerk

WARRANTS TO ISSUE as to Jennifer Renee White (1) and Brooklyn Michelle Fowler (2)

UNITED STATES DISTRICT/MAGISTRATE JUDGE

No Magistrate Case Pending

Renee H. [Signature]